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VIA ECF

April 19, 2022

Re: *USA v. Williams, 14-CR-498*

Hon. P. Kevin Castel  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Dear Judge Castel:

I write on behalf of Defendant John Williams in the above-captioned matter to respectfully request that the Court allow Mr. Williams to travel to Cancun, Mexico during the period of May 20 through 24, 2022, to attend a wedding of a friend, and at which he will be a groomsman.

On July 9, 2015, the late Judge William Pauley sentenced Mr. Williams to 84 months imprisonment and four years of supervised release. (Dkt. 149). Mr. Williams was released from custody on June 11, 2020. Since that time, he has been living with his girlfriend in the Bronx, New York.

Pursuant to the conditions of his supervised release, "the defendant shall not leave the judicial district without the permission of the court or probation officer." Mr. Williams has requested permission from U.S. Probation Officer Godwin Ogunmefun to attend his friend's wedding in Mexico. Officer Ogunmefun denied the request because Mr. Williams is not currently employed. The conditions of Mr. Williams' supervised release state that "the defendant shall work regularly at a lawful occupation, unless excused by the probation officer for schooling, training, or other acceptable reasons."

Mr. Williams was employed from May – August 2021 as a personal trainer and from September 2021 – December 2021 as a construction/demolition employee. His last position terminated because the construction project was completed. Since December, Mr. Williams has been actively searching for employment but has been unable to secure a position at this time. One issue that has arisen in seeking employment, is that Mr. Williams is unvaccinated for COVID-19 and therefore does not meet vaccination requirements for certain open

*Application GRANTED  
subject to restriction  
and requirements of the  
Probation Officer.  
SO ORDERED  
JSD  
4-20-22*

Hon. P. Kevin Castel

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positions. Mr. Williams is determined to continue actively seeking employment. Mr. Williams has otherwise met all other conditions of his supervised release.

We respectfully request that the Court grant permission for Mr. Williams travel to Mexico for the wedding.

Very truly yours,

Mark J. Stein

cc: AUSA Margaret Graham (*via* ECF)  
USPO Godwin Ogunmefun (*via* email)